

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ADX Labs, Inc., a Delaware Corporation,
ADX Holdings Pte. Ltd., a Singapore
Limited Liability Company, Acesse
Corporation, a Nevada Corporation, and
Steven Renner

Plaintiffs,

vs.

Ciprian Pungila and SciTech Software
S.R.L., a Romanian Limited Liability
Company,

Defendants.

Civil File No. 21-cv-01164

PLAINTIFFS' MOTION FOR
EXPEDITED DISCOVERY AND
EXPEDITED PRELIMINARY
INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and District of Minnesota Local Rule 7.1, Plaintiffs ADX Labs, Inc., ADX Holdings Pte. Ltd., Acesse Corporation, and Steven Renner (collectively “Plaintiffs”) hereby move the Court for expedited discovery and an expedited preliminary injunction to restrain assets against third-party cryptocurrency exchanges. Specifically, Plaintiffs seek an order for the following:

1. Plaintiffs be permitted to serve limited third-party subpoenas on United States-based cryptocurrency exchanges—Coinbase, Kraken, and Binance.US—requiring an expedited response within seven business days; and
2. Cryptocurrency exchanges Coinbase, Kraken, and Binance.US be enjoined and ordered to freeze the assets in all its accounts implicated in the fraud of Plaintiffs’ stolen assets.

In support of its motion, Plaintiffs rely on their Memorandum of Law in Support of their Motion for Expedited Discovery and Expedited Preliminary Injunction, the Declaration of Steven Renner with exhibits, the Declaration of Sean Anderson with exhibits, the Declaration of Donna Reuter with exhibits, and all of the files, records, and the arguments of counsel.

Pursuant to Local Rule 7.1(d), Plaintiffs request expedited handling of this motion.

Dated: June 25, 2021

DORSEY & WHITNEY LLP

By s/ Caitlin L.D. Hull

RJ Zayed #0309849

zayed.rj@dorsey.com

Caitlin L.D. Hull #0398394

hull.caitlin@dorsey.com

Donna Reuter #0400572

reuter.donna@dorsey.com

50 South Sixth Street, Suite 1500

Minneapolis, MN 55402

Telephone: (612) 340-2600

Facsimile: (612) 340-2868

Attorneys for Plaintiffs